

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

PRETRIAL INFORMATIVE MOTION

TO THE HONORABLE COURT:

COMES NOW Creditor PFZ Properties, Inc., thru the undersigned legal counsel, and very respectfully STATES and PRAYS as follows:

1. PFZ Properties, Inc. (“PFZ”) has filed an objection to Debtor’s “Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al.” (The Plan”) (Docket #18418).

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Counsel for PFZ wishes to participate in the Confirmation Hearing of the Plan.

3. The Party appearance Sheet is attached to this Motion as Exhibit A.

4. Pursuant to Rule 201 of the Federal Rules of Evidence, PFZ requests from this Honorable Court to take judicial notice of the fact that Eminent Domain Case K EF 2008-0480 is pending adjudication in the Court of First Instance, San Juan Ward. That fact has not been disputed by the FOMB or any other party and can be ascertained by the following documents: Docket 1447, 1510, 3059 (Adversary Proceeding 18-00056), 9223 (Objection to 3rd Plan), 16969 (Objection to Disclosure Statement) and 18418 (Objection to 7th Amended Plan).

WHEREFORE, the appearing party respectfully requests that this Honorable Court take notice of the above.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on this 25th day of October 2021.

I HEREBY CERTIFY that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send notification of such filing to all appearing parties in the above captioned bankruptcy proceeding.

/s/ DAVID CARRION BARALT
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